

TRW Inc.

Executive Offices
1900 Richmond Road
Cleveland, OH 44124

Office of Counsel

MAR 19 2001



**VIA FACIMILE AND REGISTERED MAIL,
RETURN RECEIPT REQUESTED**

March 15, 2001

U.S. Environmental Protection Agency
Deena Sheppard-Johnson, SR-6J
Remedial Enforcement Support Section
77 West Jackson Blvd.
Chicago, Illinois 60604

**Re: TRW Inc.'s Response to U.S. EPA's March 2, 2001 General Notice of
Potential Liability – Chemical Recovery Systems Site, Elyria, Ohio**

Dear Ms. Sheppard-Johnson:

The following is the response of TRW Inc. ("TRW") to EPA's General Notice of Potential Liability letter ("General Notice Letter") for the Chemical Recovery Systems Site, Elyria, Ohio, received by TRW on March 5, 2001. This response is submitted on behalf of TRW's Ross Gear Division in Lafayette, Indiana, and TRW's Valve Division in Cleveland, Ohio. (See Attachment 8 to the General Notice Letter at PRP nos. 121 and 122.)

TRW is willing to enter into good faith negotiations with EPA for participation in the performance or financing of the various remedial activities described in the General Notice Letter and for contribution to the reimbursement of EPA's past costs related to the Chemical Recovery Systems Site, provided that TRW's allocation is consistent with TRW's proportionate share of the total liability at the Site, and further provided that TRW participates as part of a group of other potentially responsible parties.

In order to respond to the General Notice Letter and accompanying information request, TRW has been trying to confirm any connection that it may have to the Site. Unfortunately, TRW has had difficulty in obtaining relevant information. EPA has provided TRW with a copy of its "dirty inventory" for the Site. However, this document has provided little assistance in obtaining relevant information. It certainly does not provide evidence linking the two TRW facilities identified in the List of Potentially Responsible Parties (Attachment 8 of the General Notice Letter) to the Site. Based on information that you provided, the two TRW facilities were included on the List solely because they are located within Region V jurisdiction. With this limited information, it is difficult for TRW to undertake a reasonable investigation of this matter.

Ms. Sheppard-Johnson

March 15, 2001

Page 2

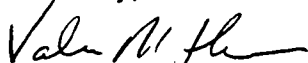
Accordingly, TRW is requesting that EPA provide it with all evidence supporting that TRW is a PRP at this Site, including but not limited to, all backup documentation for EPA's "dirty inventory," all information that identifies the specific TRW operation(s) allegedly linked to the Site, the volume and nature of substances allegedly contributed by TRW to the Site, and a ranking by volume of all the substances allegedly contributed by TRW as well as the other PRPs at the Site. TRW is further requesting detailed information regarding the amount and nature of EPA's past costs relating to the Site referenced in the General Notice Letter. Based on our discussions, it is my understanding that information responsive to TRW's request should be available in a few weeks.

TRW hopes that receipt of responsive documentation will be provided expeditiously pursuant to this request. However, in order to insure that this information is made available in a timely manner, TRW has submitted a Freedom of Information Request encompassing this information. (See Attachment).

All future contacts should be directed to:

Timothy G. O'Neill
TRW Inc.
1900 Richmond Rd.
Cleveland, Ohio 44124
PHONE: 216.291.7483

Sincerely,



Valerie M. Hanna
Counsel - Environment

Cc: Robert M. Walter, Esq.
Timothy G. O'Neill